

### **REMARKS/ARGUMENTS**

The office action of August 17, 2005 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1-14 remain in this application. Claims 15-20 have been added.

Claims 13 and 14 have been amended to correct a minor informality.

Claims 8, 9, 13 and 14 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. patent no. 6,513,719 to Imura. Claims 1-7 and 10-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Imura in view of U.S. publication no. 2002/0025726 to Nishimura. Applicants respectfully traverse this rejection.

The action alleges that Imura discloses all the elements of independent claim 8. Amended claim 8 calls for, among other features, a file management portion connected to the network interface and configured to manage a relationship between a data file from the network and an address of the memory cell array, and a memory interface connected to the file management portion and configured to convert a signal from the file management portion to a signal which is capable of being used at the control portion. To show the file management portion of claim 8, the action relies on register 310 in Fig. 3 of Imura. Contrary to the action's assertion, the register 310 of Imura is not configured to manage a relationship between a data file from the network and an address of the memory cell array. Instead, according to col. 8, lines 29-31 of Imura, the register 310 includes "a status register and a control register and is used for the CPU 316 to monitor and control the serial/parallel converter 309." Moreover, Imura does not teach or suggest a memory interface connected to the file management portion and configured to convert a signal from the file management portion. As such, Imura lacks a teaching or suggestion of the file management portion recited in claim 8.

For at least the above reasons, claim 8 is patentably distinct from Imura. Also, claims 9-14, which ultimately depend from claim 8, are allowable for the same reasons as claim 8 and further in view of the additional advantageous features recited therein. Specifically, Nishimura fails to remedy the defects noted above with respect to Imura. As such, claims 10-12 are patentably distinct.

Claim 1 also calls for a file management portion connected to the network interface and configured to manage a relationship between a data file from the network and an address of the memory cell array. Claim 1 has been rejected over the combination of Imura and Nishimura. As discussed with respect to claim 8, Imura fails to teach or suggest at least this element. Nishimura fails to remedy at least this defect of Imura. Accordingly, the combination of Imura and Nishimura, even if proper, would not have resulted in the claim 1 combination of features. Also, claims 2-7, which ultimately depend from claim 1, are allowable for the same reasons as claim 1 and further in view of the additional advantageous features recited therein.

New claims 15-20 are fully supported by the specification and allowable over the art of record. As each of claims 15-20, depend from one of claims 1 or 8, it is considered allowable for at least this reason, and further in view of the additional advantageous features recited therein.

### CONCLUSION

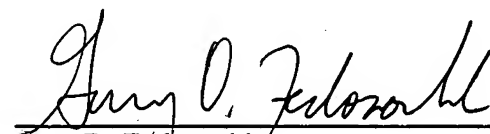
If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicit prompt notification of the same.

Respectfully submitted,  
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